

ENVIRONMENTAL CONSEQUENCES

Introduction

As part of the environmental impact statement, this section analyzes the consequences of the preferred alternative and other alternatives on Trail resources. Since the alternatives identified in the CMP are general strategies for the long-term administration and use of Trail resources, the following analysis of environmental impacts will also be general.

During implementation of the CMP, the Trail partners and cooperating agencies shall conduct any site-specific environmental review required by NEPA, Section 106 of NHPA, and state and local regulations. The Section 106 process applies to proposed federal actions with the potential to affect historic properties.

The EIS organizes findings by alternative and includes an analysis of unavoidable adverse environmental effects, short-term uses and long-term productivity, and cumulative impacts.

The analysis eliminates the following impact topics from further discussion because the preferred alternative and other Trail management alternatives would not affect these resources.

Environmental justice

Executive Order 12898 requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects on minorities or low income populations or communities.

The preferred alternative and other alternatives would not be expected to cause adverse health or environmental impacts to minorities, low-income populations or communities.

Air quality

According to air quality data collected from the Environmental Protection Agency, the Montgomery Alabama Metropolitan Statistical Area is in compliance with all national

air quality standards. The preferred alternative and other alternatives would not be expected to contribute to a decline in regional air quality.

Threatened and endangered species

No threatened or endangered species (plant or animal) are known to exist within the Trail corridor. The preferred alternative and other alternatives would not be expected to adversely affect protected species.

Floodplains

Most Trail development would occur in already disturbed areas, thus minimizing the hazards associated with proximity to the 100-year floodplain.

Wetlands

No significant wetlands exist along the Trail. The alternatives, therefore, would not have a negative impact on wetlands.

Archeological resources

No known archeological sites exist within the Trail corridor. The alternatives would not be expected to produce negative impacts on archeological resources.

Prime and unique farmland

The placement of signs and wayside exhibits along the Trail would not have an adverse affect on surrounding farmlands.

Regulations and Policies

Numerous laws and associated regulations, memoranda of agreement, and policies direct the design of project alternatives, the analysis of impacts and the development of mitigation measures.

These regulations and policies include, but are not limited to, NEPA, NHPA, Executive Order 11990 (wetlands), Executive

Order 11998 (floodplains), the Clean Air Act (CAA) and the NPS Director's Order No. 12, *Conservation Planning Environmental Impact Analysis, and Decision-making*.

Cumulative Impacts

According to the Council on Environmental Quality (CEQ), 40 CFR 1508.7, a cumulative impact results from the incremental effect of the proposed action when added to other past, present, and reasonably foreseeable future actions, regardless of who undertakes them.

Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. The analysis identifies cumulative impacts under each alternative.

Impairment of Trail Resources or Values

In addition to evaluating the environmental consequences of alternatives, NPS *Management Policies* and Director's Order-12 require a determination of the extent to which actions would impair Trail resources.

Trail managers must always seek ways to avoid or minimize to the greatest degree practicable adverse impacts on resources and values. NPS management has the discretion to allow impacts to resources and values when necessary and appropriate to fulfill the purposes of the Trail. The impact, however, must not constitute an impairment of the affected resources and values. The sections below assess any impairment of Trail resources.

Mitigating Measures

Mitigation for NEPA purposes is based on the avoidance of adverse effects or the application of standard mitigation measures. Mitigation includes actions intended to reduce the negative impacts produced by implementation of a chosen alternative.

Alternatives A, B or C would include the following mitigation measures, as necessary:

- place signs, wayside exhibits or facilities outside of the 100-year floodplain
- use silt fences or other Best Management Practices to prevent the introduction of sediment into nearby wetlands
- design all non-historic buildings with universal accessibility and environmental sustainability
- revegetate areas with species native to central Alabama
- develop a plan for filling gaps in existing archaeological data in areas likely to be disturbed
- develop procedures to cease work if ground-disturbing activity uncovers archeological resources; consult with the Alabama SHPO
- monitor signs of visitor use in excess of Trail carrying capacity, using indicators, such as damage to historic buildings, creation of "social trails" (informal trails) around facilities, damage to vegetation, or an inability of visitors to enjoy the Trail amenities due to overcrowding
- promote the development of supporting commercial uses within village centers away from US Highway 80
- promote the use of historically accurate facades for privately-owned structures adjacent to US Highway 80, consistent with NPS Management Policies

Environmentally Preferred Alternative

NPS policy requires the EIS to identify an environmentally preferred alternative to aid decision-makers in choosing among alternatives. The environmentally preferred alternative:

- (1) fulfills the responsibilities of each generation as trustees of the environment for use by succeeding generations
- (2) assures for all generations safe, healthful, productive, aesthetically-pleasing and culturally-rich surroundings
- (3) attains the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences
- (4) preserves important historic, cultural and natural aspects of our national heritage and maintains, wherever possible, an environment that supports diversity and variety
- (5) achieves a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities
- (6) enhances the quality of renewable resources and approaches the maximum attainable recycling of depletable resources

In correspondence dated September 27, 2004, the U.S. EPA rated the preferred alternative as "LO," meaning that the review did not identify any potential environmental impacts requiring changes to the proposal.

Table 23 compares the environmental impacts of the Preferred Alternative C, the No Action Alternative, and Alternatives A and B.

Table 23 Comparison of Impacts				
	No Action	Alternative A	Alternative B	Alternative C
Historic sites	<ul style="list-style-type: none"> ▪ voluntary protection of historic resources ▪ protection may be inconsistent and inadequate ▪ risk of damage to or loss of resources 	<ul style="list-style-type: none"> ▪ narrow range of sites eligible for protection under NPS certification ▪ remaining resources at risk for damage 	<ul style="list-style-type: none"> ▪ broader range of sites eligible for protection under NPS certification ▪ rehabilitation of existing historic structures in Selma and City of St. Jude ▪ some risk of damage to historic resources due to increased visitor use 	<ul style="list-style-type: none"> ▪ broadest range of sites eligible for protection under NPS certification ▪ rehabilitation of existing historic structures in Selma and City of St. Jude ▪ some risk of damage to historic resources due to increased visitor use
Landscapes	<ul style="list-style-type: none"> ▪ some preservation of significant landscapes under MOA ▪ no additional NPS coordination of viewshed protection ▪ some portions of viewshed at risk of intrusion from inappropriate uses 	<ul style="list-style-type: none"> ▪ some preservation of significant landscapes under MOA ▪ limited coordination between NPS and managing partners to protect viewshed ▪ some portions of viewshed at risk of intrusion from inappropriate uses 	<ul style="list-style-type: none"> ▪ some preservation of significant landscapes under MOA ▪ additional landscape preservation possible under NPS acquisition and collaboration with managing partners 	<ul style="list-style-type: none"> ▪ some preservation of significant landscapes under MOA ▪ additional landscape preservation possible under NPS acquisition and full collaboration with managing partners
Visitor use	<ul style="list-style-type: none"> ▪ limited opportunities for educational and interpretive programming ▪ no growth in visitor use 	<ul style="list-style-type: none"> ▪ limited interpretative programming ▪ some growth in visitor activity expected 	<ul style="list-style-type: none"> ▪ broader range of interpretive programming ▪ additional recreational opportunities ▪ growth in visitor use expected 	<ul style="list-style-type: none"> ▪ most comprehensive range of interpretive programming ▪ additional recreational and education opportunities ▪ highest expected growth in visitation

Table 23
Comparison of Impacts

	No Action	Alternative A	Alternative B	Alternative C
Land ownership and use	<ul style="list-style-type: none"> private property use unaffected 	<ul style="list-style-type: none"> potential loss of privacy to adjacent landowners minor increase of noise levels and vehicular use along Trail 	<ul style="list-style-type: none"> potential loss of privacy to adjacent landowners increase of noise levels and vehicular use along Trail 	<ul style="list-style-type: none"> potential loss of privacy to adjacent landowners highest probable increase of noise levels and vehicular use along Trail
Population and economy	<ul style="list-style-type: none"> minimal local and regional economic benefits 	<ul style="list-style-type: none"> limited increase in local and regional economic benefits 	<ul style="list-style-type: none"> increased revenue to the region from visitors new job growth displacement of commercial uses in Washington Park neighborhood 	<ul style="list-style-type: none"> highest expected increase in revenue to the region from visitors strongest expected new job growth displacement of commercial uses in Washington Park neighborhood
Trail resources and values	<ul style="list-style-type: none"> no impairment of Trail resources 	<ul style="list-style-type: none"> no impairment of Trail resources 	<ul style="list-style-type: none"> no impairment of Trail resources 	<ul style="list-style-type: none"> no impairment of Trail resources
Cumulative	<ul style="list-style-type: none"> no cumulative impacts 	<ul style="list-style-type: none"> minimal cumulative impacts 	<ul style="list-style-type: none"> positive benefit on mobility choices and economic development 	<ul style="list-style-type: none"> positive benefit on mobility choices and economic development
US Highway 80	<ul style="list-style-type: none"> alteration of viewshed from original route increased vehicular traffic along an improved roadway possible conflicts with pedestrian and bicycle use along Trail 	<ul style="list-style-type: none"> alteration of viewshed from original route increased vehicular traffic along an improved roadway possible conflicts with pedestrian and bicycle use along Trail 	<ul style="list-style-type: none"> alteration of viewshed from original route increased vehicular traffic along an improved roadway possible conflicts with pedestrian and bicycle use along Trail 	<ul style="list-style-type: none"> alteration of viewshed from original route increased vehicular traffic along an improved roadway possible conflicts with pedestrian and bicycle use along Trail
Construction impacts	<ul style="list-style-type: none"> minor, short-term, disturbance to vegetation and wildlife near site of Tent City interpretive center 	<ul style="list-style-type: none"> minor, short-term, disturbance to vegetation and wildlife near site of Tent City interpretive center 	<ul style="list-style-type: none"> minor, short-term, disturbance to vegetation and wildlife near Tent City center re-use of structures in Selma and Montgomery produce minor impacts 	<ul style="list-style-type: none"> minor, short-term, disturbance to vegetation and wildlife near Tent City center re-use of structures in Selma and Montgomery produce minor impacts

Impacts of Alternative C: The National Struggle (Environmentally Preferred Alternative)

Historic sites

Positive Impacts

Under Alternative C, the NPS would recognize the broadest range of primary, secondary and commemorative sites and route segments. Managing partners participating in the certification process would develop resource protection plans, thus maintaining consistency of stewardship and preservation among individual Trail components.

Alternative C would also rehabilitate an existing historic structure in Selma and restore and re-use portions of the historic City of St. Jude site in Montgomery. The NPS would provide technical assistance to preserve the distinguishing architectural features of the buildings. In addition to these specific actions, the NPS would coordinate an effort among managing partners to protect existing historic resources.

Negative Impacts

As the most highly publicized and coordinated Trail management approach, Alternative C would produce the highest level of use along the Trail. Unmanaged visitor activity could contribute to the deterioration of historic sites.

Landscapes

Positive Impacts

The Alabama Department of Transportation and the SHPO would cooperate to inventory the significant, historically intact landscapes along US Highway 80 and seek funding for acquisition and preservation.

Private entities would retain control of most of the land adjacent to the existing Trail right-of-way, which exposes the Trail to the risk of inappropriate commercial or industrial development. The NPS, however, would collaborate with

managing partners to protect the landscape along the Trail and actively set priorities for the acquisition of key viewsheds.

Negative Impacts

Increased visitation under Alternative C would trigger demand for tourist related development, such as restaurants, convenience stores, and overnight accommodations along the march route. Inappropriate commercial uses along US Highway 80 would detract from the aesthetic qualities of the Trail and diminish historical integrity.

Visitor use

Alternative C would enhance visitor experiences by offering the most comprehensive range of educational and recreational activities. Visitors could access a fully managed experience along the entire Trail with interpretive materials, information, and NPS staff available in Selma, Lowndes County and Montgomery.

Under this alternative, travelers could also use designated pedestrian and biking routes to explore additional recreational and cultural opportunities near the Trail corridor.

Land ownership and use

Landowners near US Highway 80 and the secondary walking and biking routes in Lowndes County could experience a loss of privacy and possible trespass by visitors. Higher traffic levels would also produce increased noise levels and possibly some minor traffic congestion at key access points during high use periods.

Since US Highway 80 is already a major transportation corridor with planned upgrades, increases in traffic volume and noise levels would be minor. The NPS could mitigate the impacts on nearby property owners by clearly designating secondary trails and walkways.

In the primarily urbanized setting of Selma and Montgomery, where much of the use is expected to be pedestrian, traffic and noise impacts would be minor.

Population and economy

Positive Impacts

Alternative C would feature three interpretive centers in Selma, Lowndes County, and Montgomery, respectively. During the construction and rehabilitation phases, the surrounding economy would receive revenue in the form of local purchases and the hiring of local labor. This impact would be short-term and provide minor economic benefits to the region.

The Alabama Bureau of Tourism and Travel and the Auburn University Montgomery Center conducted an economic impact study for the Trail in 2000. According to their analysis, which used economic impact modeling and direct household surveys, the anticipated economic impact is a function of marketing efforts for the Trail.

The study determined that market penetration levels between 25 percent and 50 percent are the most likely. Market penetration refers to the percentage of households that become aware of an attraction following the start of a promotional campaign.

At 25 percent market penetration, the Trail would attract an estimated 185,125 visitors annually over the next five years. Approximately 86 percent of these visitors would travel from states other than Alabama. Travelers would spend approximately \$13,616,348 on items, such as food, gasoline, and hotel rooms. This revenue would then re-circulate throughout the regional economy, producing a projected total economic impact of \$26,942,616.

The study also indicates that visitor activity under the 25 percent scenario would introduce 598 new jobs into the central Alabama economy with an expected increase in earnings of \$9,043,305. Job growth would take place primarily in services that support the tourist industry, such as hotels and restaurants.

At the upper range of its impact (assuming a market penetration of 50 percent), the Trail would produce 370,272

visitors annually over the next five years. Visitor activity would translate into traveler spending of \$27,232,695 and total projected spending within the local economy of \$53,885,232. The economy would add 1,195 jobs, primarily in the service sector of central Alabama.

Job creation and economic stimulus would be of significant value in a region characterized by pockets of rural poverty and unemployment.

Since Alternative C would feature the most coordinated and developed set of visitor amenities, the preferred alternative would be the likeliest among the management scenarios to generate a positive economic impact within the range identified by the study.

Negative Impacts

Alternative C would displace a grocery store on West Fairview Avenue to accommodate the interpretive center at the City of St. Jude. The existing grocery is adjacent to a poor and predominately minority neighborhood with households that are likely to be dependent on nearby stores to meet their daily needs.

To mitigate this adverse impact, NPS would cooperate with other managing partners, including the City of Montgomery, to identify a suitable, alternate site for a grocery in proximity to the Washington Park neighborhood.

Impairment of Trail resources or values

Alternative C would not impair the resources or values of the Trail.

Cumulative impacts

The implementation of Alternative C combined with existing plans to expand transit and pedestrian opportunities would be expected to have a long-term, positive benefit on mobility choices within the Montgomery area.

Alternative C could also strengthen other economic development initiatives in the area, particularly in Lowndes County, which has pockets of poverty and unemployment. This cumulative result would contribute to an improved long-term change in the social and economic functions of the area.

Impacts of the No Action Alternative

Historic sites

Existing volunteer entities or individuals would continue to manage historic sites along the Trail. Without an NPS-led certification process, however, protection for resources would be inconsistent and possibly inadequate.

The No Action Alternative would not adversely affect historic structures through increased visitor use. The lack of heightened awareness for historic resources and the inability to manage inappropriate uses along the Trail, however, may cause harm to sites through neglect, inappropriate use, or inadvertent destruction.

Landscapes

As part of the MOA, ALDOT and the SHPO would cooperate to inventory the significant, historically intact landscapes along the corridor and seek funding for acquisition and preservation.

Private entities would retain control of most of the land adjacent to the existing Trail right-of-way. The NPS would not coordinate with other managing partners to protect the historic and cultural integrity of the Trail landscape. The landscapes along the Trail, therefore, would remain vulnerable to inappropriate commercial and industrial activity.

Visitor use

Under the No Action Alternative, the Trail partners would not increase interpretive and educational efforts. Visitors would continue to have few opportunities to learn the significance of individual Trail sites and the story of the Modern Civil Rights Movement as a whole.

In the absence of a coordinated effort to explain the significance of the 1965 events, the history of African-American struggles to gain voting rights equality would remain inaccessible to travelers in the area.

Visitors also would not be able to access information on the additional recreational and cultural opportunities available within the US Highway 80 corridor.

Land ownership and use

The No Action Alternative would not produce increased levels of visitor activity that affect private property use along US Highway 80.

Population and economy

With limited increases in visitation anticipated, the economic benefits of the No Action Alternative on the local and regional economies would be minimal.

Impairment of Trail resources or values

The No Action Alternative would not impair the resources or values of the Trail.

Cumulative impacts

Since the No Action Alternative produces no incremental impacts on the Trail or surrounding area, this management option would result in no cumulative impacts.

Impacts of Alternative A: The Story of the March

Historic sites

Positive Impacts

Existing management of historic resources would continue with some added protection for a narrow range of NPS-certified sites.

Alternative A would be unlikely to produce visitor levels that would threaten existing resources.

Negative Impacts

The minimal Trail recognition provided in this alternative, however, could contribute to the deterioration or loss of non-certified sites through neglect, inappropriate use, or inadvertent destruction.

Landscapes

Positive Impacts

As part of the MOA, ALDOT and SHPO would cooperate to inventory the significant, historically intact landscapes along the corridor and seek funding for acquisition and preservation.

With limited gains in visitor use expected, this alternative would not produce pressure to develop new tourism-related uses along US Highway 80.

Negative Impacts

Private entities would retain control of most of the land adjacent to the existing Trail right-of-way. The NPS would coordinate on a limited basis with other managing partners to

protect the historic and cultural integrity of the Trail landscape, leaving portions of the viewshed vulnerable to intrusion.

Visitor use

Under Alternative A, the Trail partners would interpret a limited range of themes related directly to local events between March 7 and 25, 1965 in Dallas, Lowndes, and Montgomery counties, Alabama. Visitors would not have access to information on the broader history and significance of the march.

Visitors also would not be able to readily explore the additional recreational and cultural opportunities available within the US Highway 80 corridor.

Land ownership and use

Due to its lower activity level, Alternative A would be expected to produce limited noise, increased vehicular use, or loss of privacy to adjacent landowners.

Population and economy

Positive Impacts

Alternative A may produce some limited gain in visitor use and associated spending. Since this management approach lacks a full set of visitor amenities, however, it would be expected to produce smaller positive economic impacts than the preferred alternative.

Negative Impacts

Alternative A also would not produce the economic benefits associated with facility construction and rehabilitation in Selma and Montgomery.

Impairment of Trail resources or values

Alternative A would not impair the resources or values of the Trail.

Cumulative impacts

Alternative A would be expected to produce minimal cumulative impacts on the surrounding area.

Impacts of Alternative B: The Regional Struggle

Historic sites

Positive Impacts

Alternative B is similar to the preferred alternative, but would recognize fewer certified sites. This alternative would also preserve and re-use existing historic structures and sites in Selma and the City of St. Jude in Montgomery.

Negative Impacts

Historic sites not certified under Alternative B could be adversely affected. As with the preferred alternative, higher levels of visitor use may threaten some historic sites through tourist-related development.

Landscapes

Positive Impacts

ALDOT and the SHPO would cooperate to inventory the significant, historically intact landscapes along the corridor and seek funding for acquisition and preservation.

Private entities would retain control of most of the land adjacent to the existing Trail right-of-way. Similar to the preferred alternative, the NPS would collaborate with managing partners to protect the landscape, as well as set priorities for the acquisition of key viewsheds.

Negative Impacts

Alternative B would trigger demand for tourist related development, which could lead to possible encroachment of incompatible commercial uses. Such uses would detract from the aesthetic qualities of the Trail and diminish historical integrity.

Visitor use

Similar to the preferred alternative, Alternative B would offer visitors a range of educational and recreational opportunities in Selma, Lowndes County, and Montgomery. Visitors, however, would not have access to an NPS-managed experience along the entire length of the Trail.

Land ownership and use

Alternative B could produce more noise, increased vehicular use, and possible loss of privacy to adjacent landowners.

Population and economy

Alternative B would provide a slightly reduced level of visitor amenity than the preferred alternative and, therefore, would be expected to produce smaller positive economic impacts than the preferred alternative.

Impairment of Trail resources or values

Alternative B would not impair the resources or values of the Trail.

Cumulative impacts

Alternative B would produce cumulative impacts similar to the preferred alternative.

Unavoidable Adverse Environmental Effects (all alternatives)

US Highway 80

Under all alternatives, ALDOT would add two lanes parallel to non-historic portions of US Highway 80 in Lowndes County in accordance with the ALDOT/FHWA/SHPO MOA.

The new lanes would alter the viewshed from the original route, but MOA provisions would minimize the visual impact on the historic segments of the roadway.

Increased vehicular traffic along an improved US Highway 80 could also conflict with pedestrian and bicycle use along the Trail. To mitigate this impact, the Trail partners should cooperate with ALDOT to mark safe pedestrian segments along US Highway 80 for visitors wishing to recreate the original march.

The Trail partners could also reduce traffic impacts during peak Trail use by cooperating with ALDOT to close portions of US Highway 80 during specially scheduled commemorative activities.

Tent City Interpretive Center

The construction of an interpretive center at the Tent City site in Lowndes County would alter the viewshed of the area. The center would, however, increase visitor opportunities to view and enjoy the mostly undisturbed rural countryside surrounding the site.

Construction activities

The preferred alternative, and potentially the other alternatives, would add historic Trail markers and wayside exhibits, interpretive centers and a contact station at key points along the Trail. Trail improvements and facility development would produce minor short-term impacts on soils, vegetation, and wildlife.

Soils and Sedimentation

The renovation of existing structures in Selma and the City of St. Jude would have no impact on soils. Construction at the Tent City facility, however, would displace and disturb soils and add paved surfaces around the site. Impacts caused by soil disturbance would be minor and short-term. The increase in storm water runoff associated with more paved surfaces, however, is a long-term impact. Best management practices can mitigate the effects of soil loss and increased storm water runoff.

Vegetation

Some Trail improvements and facility developments would require the removal of vegetation. The NPS and managing partners would assess impacts to vegetation on a site-specific basis and develop appropriate mitigation, such as revegetation with native plants.

The use of secondary pedestrian and bicycle trails and a general increase in human activity in rural portions of Lowndes County could also have an impact on vegetation.

Wildlife

Since the roadway already exists for the length of the march route and two of the three interpretive centers would be in existing structures, the construction process would cause minimal and short-term disturbance of wildlife.

The use of secondary pedestrian and bicycle trails and a general increase in human activity in rural portions of Lowndes County could also have an impact on surrounding wildlife.

Short-Term Uses and Long-Term Productivity (all alternatives)

Alternatives B and C recommend land use changes to accommodate interpretive centers. In Selma, existing structures would house an interpretive center, while at the City of St. Jude, the managing partners would convert an existing strip commercial development into an interpretive center.

In Selma, the former Peoples Bank building would contain the majority of interpretive amenities. The building is currently vacant. Other structures surrounding the building would become part of the interpretive center. Current tenants in the buildings would relocate.

At the City of St. Jude, the existing strip commercial center has several operating stores and two stand-alone vacant buildings. Tenants currently using the spaces would relocate.